Remarks

A. Claims In The Case

Claims 6-20, 31, and 78 are pending in the case. Claims 6, 8, 31, and 78 have been amended.

B. The Claims Are Not Obvious Over Bellinger in View of Hinkle Under 35 U.S.C. § 103(a)

The Examiner rejected claims 6-20, 31, and 78 as being obvious over U.S. Patent 5,870,725 to Bellinger ("Bellinger") in view of U.S. Patent No. 6,442,533 to Hinkle ("Hinkle"). Applicant respectfully disagrees with these rejections.

To reject a claim as obvious, the Examiner has the burden of establishing a *prima facie* case of obviousness. *In re Warner*, 154 U.S.P.Q. 173, 177-78 (C.C.P.A. 1967). To establish *prima facie* obviousness of a claimed invention, all claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974); MPEP § 2143.03.

Claims 6 and 31 have been amended to describe a combination of features including:

> preparing a key definition from the two or more key elements corresponding to the at least two selected key element representations in response to the user selecting the at least two key element representations; and
>
> storing the key definition in the database; the key definition being configured for use in preparing a processing key value from a transaction-related data in the FSO computer system,
>
> wherein the processing key value is configured for use in locating a process control data set in the database in the FSO computer system, the process control data set comprising one or more process control data values and configured for use in processing the transaction-related data in the FSO computer system.

Support for the amendments to the claims can be found in Applicant's specification at least on page 21, line 24 to page 23, line 12; and FIGS. 6 and 7. The cited art does not appear to teach or

suggest at least the above-quoted feature of claims 6 and 31.

The Office Action acknowledges that Bellinger does not teach preparing a key definition from one or more key elements corresponding to one or more selected key element representations in response to the user selecting the one or more key element representations, and storing the key definition in the database; the key definition being configured for use in preparing a processing key value from transaction-related data in the Financial Services Organization (FSO) computer system, wherein the processing key value is configured for use in locating a process control data set in the database in the FSO computer system, the process control data set comprising one or more process control data values and configured for use in processing the transaction-related data in the FSO computer system. The Office Action takes the position that Hinkle teaches these features. Applicant respectfully disagrees with the Office Action's position.

Hinkle states:

> Referring still to FIG. 2, a high level view of the processing performed when processing a transaction 58 is provided. In particular, the transaction processing controller 54 receives an input transaction 58 and invokes the preprocessor and decomposer 54. The preprocessor and decomposer 54 subsequently performs, for each transaction 58, the following functions: (a) determines, using input from the business enterprise databases 70, whether all necessary data for performing the transaction is available and otherwise rejects the transaction without performing any portion thereof. In particular, the transaction preprocessor and decomposer 54 determines that all data tables to be accessed are available; (b) retrieves the data needed to perform the transaction; (c) checks to determine that the transaction operation(s) requested is available, and that the transaction is legitimate to be performed on the data for the input transaction 58; (d) retrieves the subtransaction data descriptors for decomposing the input transaction 58 into subtransactions.
> (Hinkle, column 7, lines 19-40)

Hinkle discloses a preprocessor and decomposer that performs for multiple transactions: determining whether all necessary data is available, retrieving the necessary data, checking to determine that the transaction operations are available, and retrieving subtransaction data descriptors for decomposing input transactions into subtransactions. (Hinkle, column 7, lines 23-40). Hinkle does not appear to teach or suggest preparing a key definition from two or more key elements corresponding to selected key element representations in response to a user selecting at

least displayed two key element representations, and storing the key definition in a database. In any event, Hinkle does not appear to teach or suggest preparing a key definition from two or more key elements corresponding to selected key element representations in response to a user selecting at least two key element representations; and storing the key definition in a database, the key definition being configured for use in preparing a processing key value from a transaction-related data in the FSO computer system, the processing key value configured for use in locating a process control data set in the database in the FSO computer system, the process control data set comprising one or more process control data values and configured for use in processing the transaction-related data in an FSO computer system.

For at least the reasons stated above, the combination of the features of claims 6 and 31 are not taught or suggested by Bellinger and Hinkle. Applicant requests removal of the rejections of claim 6 and the claims dependent thereon, and the removal of the rejection of claim 31.

Applicant submits that many of the claims dependent on claims 6 and 31 are separately patentable. For example, amended claim 8 describes a combination of features including: "wherein the preparing the key definition from the one or more key elements further comprises the user specifying a sequence of the key elements in the key definition, wherein the user specifying a sequence of the key elements in the key definition comprises the user specifying the place of each of the selected key data element in a sequence of the selected key data elements for the key definition." Support for the amendments to claim 8 may be found in Applicant's specification at least on page 22, lines 4-21 and FIG. 6. The cited art does not appear to teach or suggest at least these features of claim 8, in combination with the other features of the claims.

The portions of Bellinger cited in the Office Action disclose a "system control facility (SCF)" for an item capture system (Bellinger, column 16, lines 4-53). Reconcilement clerks familiar with particular commercial customer's accounts and media requirements update an SCF data base with parameters such as master customer number, associated account numbers, number of copies, media type, customer name, address, and item number (Bellinger, column 16, lines 8-45). Bellinger does not appear to teach or suggest preparing the key definition from key elements

wherein the user specifies a sequence of the key elements in the key definition, the user specifying the place of each of the selected key data element in a sequence of the selected key data elements for the key definition.

Claim 17 describes a combination of features including: "the user defining one or more key masks for the key definition, wherein each key mask comprises one or more mask fields, wherein the one or more mask fields in the key mask correspond to the one or more key elements in the key definition; and storing the one or more key masks in the database." The cited art does not appear to teach or suggest at least these features of claim 17, in combination with the other features of the claims. The Office Action acknowledges that Bellinger and Hinkle fail to teach the above-quoted feature of claim 17. Nevertheless, the Office Action takes the position that: "it would have been obvious to one having ordinary skill in the art at the time the invention was made for the user to define one or more key masks for the key definition wherein each key mask comprises one or more mask fields, wherein the one or more mask fields in the key mask correspond to the one or more key elements in the key definition; and storing the one or more key masks in the database and to modify in Bellinger because such a modification would allow Bellinger to have fields which are constants or bound variables with the mask field set to match those fields." Applicant respectfully disagrees with the Office Action's position. Moreover, the Examiner appears to rely on facts within the personal knowledge of the Examiner. Pursuant to MPEP §2144.03, Applicant respectfully requests the Examiner provide support for her assertion either by affidavit or by references brought to the Applicant's attention, or that the rejection be removed.

Claim 18 describes a combination of features including: "wherein the user defining the one or more key masks further comprises the user selecting a mask field value from a plurality of mask field values for each of the one or more mask fields in each of the one or more key masks, and wherein the plurality of mask field values comprises an equal mask field value and a wildcard mask field value." The cited art does not appear to teach or suggest at least these features of claim 18, in combination with the other features of the claims. The Office Action acknowledges that Bellinger and Hinkle fail to teach the above-quoted feature of claim 18.

Nevertheless, the Office Action takes the position that: "It would have been obvious to one having ordinary skill in the art at the time the invention was made for the user to define one or more key mask fields values for each of the one or more mask fields in each of the one or more key masks, and wherein the plurality of mask field values comprises an equal mask field value and a swildcard mask field value and to modify Bellinger because such a modification would allow Bellinger to have fields which are constants or bound variables with the mask field set to match those fields." Applicant respectfully disagrees with the Office Action's position. Moreover, the Examiner appears to rely on facts within the personal knowledge of the Examiner. Pursuant to MPEP §2144.03, Applicant respectfully requests the Examiner provide support for her assertion either by affidavit or by references brought to the Applicant's attention, or that the rejection of claim 18 be removed.

Amended claim 78 describes a combination of features including:

receiving a selection by a user of two or more data elements selected from the dictionary of data elements;
for each of the selected data elements, receiving from the user an input specifying the place of the data element in a sequence of the two or more data elements,
the selected data elements in the used-specified sequence defining a user-defined key

Support for the amendments to the claim can be found in Applicant's specification at least on page 21, line 24 to page 23, line 12; and FIGS. 6 and 7. The cited art does not appear to teach or suggest at least the above-quoted feature of claim 78.

The Office Action acknowledges that Bellinger does not teach a dictionary of data elements. Moreover, the Office Action does not appear to cite any references disclosing a data dictionary. Nevertheless, the Office Action takes the position that it would have been obvious to have dictionary of data elements and to modify Bellinger because "such a modification would allow Bellinger to have the capability to access the data element easier and faster since they would either be listed in ascending or descending order." Furthermore, the Office Action takes the position that Bellinger teaches receiving a selection of one or more data elements selected from a dictionary of data elements, the selected data elements being arranged in a particular

sequence to identify a user-defined key, the user-defined key being configured during a configuration of the FSO computer system and describing a location of one or more corresponding data element values stored in an FSO database. Applicant respectfully disagrees with these positions.

Bellinger states:

> Check images are acquired or captured by way of an end of cycle image recapture process. This recapture pass typically is performed in the bank's account reconcilement processing area. Commercial customers of a bank that have elected to participate or subscribe to this system, whether they are internal bank departments, such at Trust Services, or external bank customers, have their physical checks stored in account number order by date on a daily basis. At the end of the account statement cycle, which could be daily, weekly or monthly, an ARP reconcilement process is initiated whereby the paid and miscellaneous transactions are compared to the debits posted to the customer's Demand Deposit Account ("DDA") resulting in the prime capture pass. A paid transaction is a check that has successfully been cleared by a bank. A miscellaneous transaction is a paper or electronic transaction that affects the balance of the account. At the same time the account is reconciled, the ARP clerk will send the physical checks for that cycle period to a check image recapture site. The image recapture process is performed in a batch processing environment. A customer's account is defined by a check processing batching entry number, which is used in a check processing operations department to track groups of work. This entry number follows the checks through their image life cycle and becomes a key field for identifying and retrieving groups of check images.
> (Bellinger, column 11, lines 40-64).

Bellinger discloses a check image recapture process performed in a batch processing environment. A customer's account is defined by a check processing batching entry number. The entry number becomes a key field for identifying and retrieving groups of check images. Bellinger does not appear to teach or suggest receiving a user selection of two or more data elements selected from a dictionary of data elements, and, for each of the selected data elements, receiving from the user an input specifying the place of the data element in a sequence of the two or more data elements, the selected data elements in the used-specified sequence defining a user-defined key. Applicant submits that, for at least the reasons stated above, the combination of the features of claim 78 are not taught or suggested by Bellinger and Hinkle. Applicant requests removal of the rejection of claim 78.

C. Additional Comments

Based on the above, Applicant submits that all claims are now in condition for allowance. Favorable reconsideration is respectfully requested.

If an extension of time is required, Applicant hereby requests the appropriate extension of time. Applicant believes no fees are due with the submission of this response. If any fees are required, please charge those fees to Meyertons, Hood, Kivlin, Kowert & Goetzel, P.C. Deposit Account Number 50-1505/5053-31401/EBM.

Respectfully submitted,

David W. Quimby

David W. Quimby
Reg. No. 39,338
Attorney for Applicant

MEYERTONS, HOOD, KIVLIN, KOWERT & GOETZEL, P.C.
P.O. BOX 398
AUSTIN, TEXAS 78767-0398
Ph. 512-853-8800 Fax 512-853-8801

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